

1 EDWARD A. TREDER
State Bar No. 116307
2 MASUMI J. PATEL
State Bar No. 233921
3 BARRETT DAFFIN FRAPPIER
4 TREDER & WEISS, LLP
5 20955 Pathfinder Road, Suite 300
Diamond Bar, CA 91765
6 (626) 915-5714 – Phone
7 (626) 915-0289 – Fax
File No. 20090015002404
8 Attorneys for Defendant NDeX WEST, LLC
9
10

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

13 RICHARD PEY,
14

15 Plaintiff,

16 vs.

17 WACHOVIA MORTGAGE
18 CORPORATION; WELLS FARGO
19 BANK, N.A.; NDEX WEST LLC; and
20 DOES 1-20, Inclusive,

21 Defendants.
22
23
24
25
26
27
28

CASE NO. 11-CV- 02922 SC

**STIPULATION TO EXTEND TIME
TO RESPOND TO INITIAL
COMPLAINT BY NOT MORE
THAN 30 DAYS (L.R. 6-1)**

Removal Date: June 14, 2011
Current Response Date: July 21, 2011
New Response Date: July 27, 2011

STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL
COMPLAINT BY NOT MORE THAN 30 DAYS (L.R. 8-3)

**TO THE COURT; AND TO ALL PARTIES AND TO THEIR COUNSEL
OF RECORD:**

Pursuant to Local Rule 6-1, Plaintiff RICHARD PEY and Defendant NDeX WEST, LLC on the other, by and through their counsel of record, do hereby stipulate to extend the time for Defendant NDeX WEST, LLC to respond to Plaintiff RICHARD PEY's Complaint up to and including July 27, 2011. (N.D. Cal. Local Rule 6-1.) This Stipulation do not extent the time for more than a cumulative total of thirty (30) days from the date the response initially would have been due (*Id.*) In return Defendant NDeX WEST, LLC agrees to postpone the sale date of the property at issue from June 29, 2011 to no earlier than September 24, 2011.

GOODELL LAW FIRM

Dated: July 21, 2011

By: /s/ Nelson W. Goodell
NELSON W. GOODELL, Attorneys for Plaintiff
RICHARD PEY

BARRETT DAFFIN FRAPPIER TREDER &
WEISS, LLP

Dated: July 21, 2011

By: /s/ Masumi J. Patel
MASUMI J. PATEL, Attorneys for Defendant
NDeX WEST, LLC



STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL
COMPLAINT BY NOT MORE THAN 30 DAYS (L.R. 8-3)

CERTIFICATE OF SERVICE

I, the undersigned, declare that I am over the age of 18 and am not a party to this action. I am employed in the city of Diamond Bar, California; my business address is 20599 Pathfinder Road, Ste 300; Diamond Bar, CA., County of Los Angeles.

On the date below, I served a copy of the following document(s):

STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT BY NOT MORE THAN 30 DAYS (L.R. 8-3)

on all interested parties in said case addressed as follows:

Served Electronically Via The Court's CM/ECF System:

Counsel for Defendants:

Wachovia Mortgage Corporation and Wells Fargo Bank, NA.

Raymond Mark Collins, Esq., (rcollins@afret.com)

ANGLIN FLEWELLING RASMUSSEN

CAMPBELL & TRYTTEN, LLP

199 S. Los Robles Avenue, Ste 600

Pasadena, CA 91101

Plaintiffs

Nelson W. Goodell, Esq., (nelson.goodell@gmail.com)


The Goodell Law Firm

1750 Montgomery Street, Ste 139

San Francisco, CA 94111

BY MAIL: By placing the envelope for collection and mailing following our ordinary business practices. I am readily familiar with the firm's practice of collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in Diamond Bar, California, in sealed envelopes with postage fully thereon.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made. This declaration is executed in Diamond Bar, California, on **July 26, 2011**


Elizabeth Gonsalves

STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT BY NOT MORE THAN 30 DAYS (L.R. 8-3)